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**FILED**

JAN 21 2016

Clerk, U S District Court  
District Of Montana  
Billings



**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**


**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**JONATHAN JAY EAGLEMAN,**

**Defendant.**

**CR 16 -  -GF-BMM**

**INDICTMENT**

**FALSE STATEMENTS TO A FEDERAL  
AGENCY**

**(Counts I, II and III)**

**Title 18 U.S.C. § 1001(a)(2)**

**(Penalty: Five years imprisonment, 250,000  
fine, and three years supervised release)**

**THE GRAND JURY CHARGES:**

**COUNT I**

That on or about September 24, 2012, near Box Elder, within the State and District of Montana, the defendant, JONATHAN JAY EAGLEMAN, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the United States

Environmental Protection Agency by falsely representing in a telephone conference call with EPA officials and others that the Chippewa Cree Tribal Water Resources Department had discovered the Sangrey drinking water tank #2 on the Rocky Boy's Indian Reservation compromised on September 22, 2012, when in truth and in fact as the defendant, JONATHAN JAY EAGLEMAN, then well knew, the Chippewa Cree Tribal Water Resources Department had discovered the Sangrey drinking water tank #2 compromised on August 30, 2012 in violation of 18 U.S.C. 1001(a)(2).

## COUNT II

That on or about September 25, 2012, near Box Elder, within the State and District of Montana, the defendant, JONATHAN JAY EAGLEMAN, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the United States Environmental Protection Agency by falsely representing in a Chippewa Cree Tribal Water Resources Department Public Notice, entitled "PRECAUTIONARY DRINKING WATER WARNING! DO NOT USE THE WATER" that, on September 24, 2012, the Department had discovered that one of its finished water storage tanks was open and potentially vandalized, when in truth and in fact as the defendant, JONATHAN JAY EAGLEMAN, then well knew, the Chippewa Cree Tribal Water Resources Department had discovered the Sangrey drinking water

tank #2 compromised on August 30, 2012 in violation of 18 U.S.C. 1001(a)(2).

COUNT III

That on or about September 26, 2012, near Box Elder, within the State and District of Montana, the defendant, JONATHAN JAY EAGLEMAN, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the United States Environmental Protection Agency by falsely representing in telephone conference call with EPA officials and others that the Chippewa Cree Tribal Water Resources Department had discovered the Sangrey drinking water tank #2 on the Rocky Boy's Indian Reservation compromised on September 22, 2012, when in truth and in fact as the defendant, JONATHAN JAY EAGLEMAN, then well knew, the Chippewa Cree Tribal Water Resources Department had discovered the Sangrey drinking water tank #2 compromised on August 30, 2012 in violation of 18 U.S.C. 1001(a)(2).

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

*for: [Signature]*  
MICHAEL W. COTTER  
United States Attorney

*[Signature]*  
JOSEPH E. THAGGARD  
Criminal Chief Assistant U.S. Attorney

2-25-16 @ 10:00am  
Before JTT in  
GF

Crim. Summons ☒

Warrant: \_\_\_\_\_

Bail: \_\_\_\_\_